

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Interstate Brands Corp  
Alexandria, Rapides Parish, Louisiana  
Agency Interest Number: 5849  
Activity Number: PER20090001  
Proposed Permit Number: 2360-00088-V4**

**I. APPLICANT**

**Company:**

Interstate Brands Corp  
3400 S MacArthur Dr  
Alexandria, Louisiana 71302

**Facility:**

Interstate Brands Corp  
3400 S MacArthur Dr  
Alexandria, Rapides Parish, Louisiana

Latitude      31    15    45.97                      Longitude    92    27    4.68

**II. FACILITY AND CURRENT PERMIT STATUS**

Interstate Brands Corp (IBC) owns and operates a bakery in Alexandria, Louisiana. The bakery produces bread and buns. It was built and operated by Holsum Bread Company since 1969. Ownership of the bakery went from Holsum Bread to Cottons Holsum Bakery to Cotton Brothers Baking Co. and is presently owned and operated by Interstate Brands Corporation (IBC).

Bread varieties are produced using the sponge-dough process and bun varieties are produced using a brew system. Flour is received by trucks and is stored in silos. The flour is mixed with yeast, water and other minor ingredients to create a sponge that is fermented. The fermented sponge is further mixed with additional flour and other miscellaneous ingredients to create the dough. The final dough is extruded through dividers, shaped and dropped into pans, passed through the proofer to allow the dough to rise, and are baked in the appropriate (bread or bun) oven. The finished product is cooled, sliced, bagged, labeled with inkjet printers and loaded on trucks for shipping.

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The facility was issued its initial Part 70 Permit No. 2360-00088-V0 on August 17, 1998. Part 70 Operating Permit No. 2360-00088-V2 was issued on October 13, 2004. A renewal/modification request was approved and Permit No. 2360-00088-V3 was issued on March 7, 2005, under which the facility is currently operating.

### III. PROPOSED PROJECT/PERMIT INFORMATION

#### Application

A permit application was submitted on September 2, 2009 requesting renewal and modification of a Part 70 operating permit for the Interstate Brands Corp Alexandria Bakery. Additional information dated December 18, 2009 was also submitted.

#### Project

IBC requests renewal of the Part 70 Operating Permit 2360-00088-V3 and proposes the following actions:

1. Move the two small boilers, EP 7 and EP 7A and a 1.1 MM BTU/HR space heater to the list of Insignificant Activities,
2. Remove the diesel and gasoline storage tanks, Emission Points EP 5 and EP 6, and
3. Update the emissions using the most recent emission factors.

#### Proposed Permit

Permit 2360-00088-V4 will be the renewal/modification of Part 70 operating permit 2360-00088-V3 for the Interstate Brands Corp – Alexandria Bakery.

#### Permitted Air Emissions

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After*</u>	<u>Change</u>
PM <sub>10</sub>	0.96	0.75	- 0.21
SO <sub>2</sub>	0.03	0.02	- 0.01
NO <sub>x</sub>	5.42	3.90	- 1.52
CO	4.55	3.27	- 1.28
VOC	198.21	158.49	- 39.72

*\*Includes 6.24 tons of toxic air pollutants (TAPs).*

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#### IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

##### Applicability and Exemptions of Selected Subject Items

ID No.	Requirement	Note
UNF001 – Facility Wide	Prevention of Air Pollution Emergency Episode – LAC 33:III.5609 State Only - Pending Federal Approval	EXEMPT – Not listed in Tables 5, 6 and 7
	40 CFR 61 – Subpart M -National Emission Standards for Asbestos. [40 CFR 61.148]	Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M. [40 CFR 61.148]
	Comprehensive TAP Emission Control Program, LAC 33:III.5109 State Only – Pending Federal Approval	EXEMPT – Does not meet the threshold quantity limits.
	Chemical Accident Prevention Provisions 40 CFR 68	EXEMPT – Does not meet the threshold quantity limits.
EQT 006 - EP1 and EQT 007 – EP2- Flour Handling Vent No. 1 and Vent No. 2	Emission Standards for Particulate Matter (Including Standards for Some Specific Fugitives). LAC 33:III.Chapter 13	Comply with the emission limits of LAC 33:III.1311.B
EQT008 - EP3A and EQT020 - EP3B - Bread Oven Front and Rear Stacks	Control of sulfur dioxide emissions. LAC 33:III.Chapter 15	DOES NOT APPLY- Emits less than 5 tons per year of sulfur compounds SO <sub>2</sub> (LAC 33:III. 1502.A.3).
	Emission Standards for Particulate Matter (Including Standards for Some Specific Fugitives). LAC 33:III.Chapter 13	Comply with the total suspended particulate limit of $\leq 0.6$ lb/MMBTU of heat input) by using sweet natural gas as fuel. LAC 33:III.1313.C

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ID No.	Requirement	Note
EQT019 - EP22 Videojet Printing	Control of Emissions of Organic Compounds, Subchapter B – Organic Solvents LAC 33:III.2123	EXEMPT – Emissions less than three pounds per hour and also less than 15 pounds per day (LAC 33:III. 2123.A).
EQT018 – EP4A and EQT021 – EP4B - Bun Oven Front and Rear Stacks	Control of Emissions of Smoke.  LAC 33:III.Chapter 11	Comply with opacity $\leq$ 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity $\geq$ 20 percent for not more than six- minute. LAC 33:III.1101.B
	Control of sulfur dioxide emissions.  LAC 33:III. Chapter 15	DOES NOT APPLY- Unit emits less than 5 tons per year of sulfur compounds SO <sub>2</sub> (LAC 33:III. 1502.A.3).

**Prevention of Significant Deterioration/Nonattainment Review**

Not applicable.

**Streamlined Equipment Leak Monitoring Program**

Not applicable.

**MACT Requirements**

Not applicable.

**Air Quality Analysis**

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions for this renewal and modification.

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

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**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

There is no permit shield in this permit.

**VI. PERIODIC MONITORING**

Filter vents: Visible emissions monitored by visual inspection/determination daily. If visible emissions are observed, restore operation of the filter to its normal or usual manner of operation as expeditiously as practicable, but at a minimum within three working days, in accordance with good air pollution control practices for minimizing emissions.

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## **VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.